Comments re: NPRM FCC 04-29

I write as a concerned licensed radio amateur, N2LLS.

I was on the technical staff of a carrier current station, WYBC 640KC, in the mid-fifties. Our system consisted of underground co-ax network coupled to the power wiring in individual campus buildings. As a result of that experience I am keenly aware of how hard it is to limit the emissions of a carrier current system.

Although the proposed rules state that the system operators are responsible for interference to licensed services and for licensed services interference to their system, I find it hard to believe that will be the case in practice. Neither the local utility providing BPL nor my neighbors are likely to care if I am no longer able to communicate with some foreign station with a weak signal. Nor do I expect any consideration from the BPL provider, my neighbors, or the local press, much less help from the FCC should my signal interfere with the BPL system.

There is no mention of any practical interference resolution procedure. It would appear that the only recourse a licensed amateur operator would have would be years of legal procedures that are out of reach of the vast majority.

I strongly recommend a gradual trial deployment of BPL systems to determine if our interference concerns are justified before any large scale implementation.

Also specific comments:

RE: # 35

35. ... In considering this interference potential, we note that ARRL acknowledges that noise from power lines, absent any Access BPL signals, already presents a significant problem for amateur communications.92 We therefore would expect that, in practice, ***many amateurs already orient their antennas to minimize the reception of emissions from nearby electric power lines.***
(Emphasis mine).

My experience is that di-poles antennas are normally erected based on available supporting structures (e.g. trees) and constraints of lot lines. Beams are almost universally aimed to maximize the signal of the desired station. There is little that can be done about whatever power line emissions exist.

RE: # 39

... Thus, operations must cease if harmful interference to licensed services is caused. Given that there is significant investment in the deployment of the service, we agree with several commenters that Access BPL providers would have a strong incentive to exercise the utmost caution in installing their systems to avoid harmful interference and ensure uninterrupted service to their customers.98 ...

I disagree. I believe they would consider their large investment as a justification to ignore the problems of their interference to amateurs and treat any source of interference to their system harshly.

RE: #41

41. We believe that this requirement is reasonable and practicable for Access BPL operators and equipment manufacturers to implement. We observe that a number of Access BPL devices currently employ OFDM modulation techniques, which facilitate the ability to dynamically select the specific frequencies used to provide service and to ***avoid use of specific frequencies*** *where operation might result in harmful interference.*

Amateur practice is rarely confined to specific frequencies but rather bands. It is hard to see how avoiding specific frequencies would be of much benefit.

RE: # 42

42. Second, we propose to require that Access BPL devices incorporate a shut-down feature that would deactivate units found to cause harmful interference, and thereby allow speedy implementation of interference mitigation measures.

It is hard to believe a call to a local BPL provider in the event of a problem would result in a shut down to "mitigate" the problem. This is simply unrealistic.

43. Finally, we propose to subject Access BPL systems to a notification requirement similar to the notification requirements in our rules for power line carrier (PLC) systems.[102]

That would be very useful.

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